



200 Clara Avenue, Ukiah, CA 95482

Tel: 707-462-6605 Fax: 707-462-6642

www.pamelasproducts.com

Date: August 3, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW., Room 4008
So. Ag Stop 0268
Washington, DC 20250

Via E-mail: National.List@usda.gov
Via Fax: (202) 205-7808

RECEIVED
USDA NATIONAL
ORGANIC PROGRAM
2005 AUG 11 A 7:50

Dear Mr. Neal,

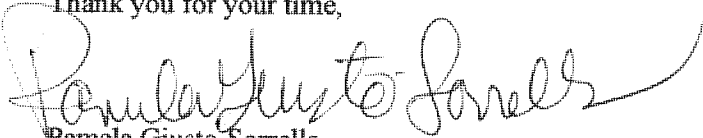
The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Pamela's Products, Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

Lecithin (unbleached), as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as an alkalizing agent in Organic Dutch Process Cocoa Powder.

Pamela's Products currently uses organic chocolate to produce our organic Pamela's Dark Chocolate Chocolate Chunk Cookies, Pecan Chocolate Chunk Shortbread, Espresso Chocolate Chunk Cookies, Chocolate Chip Oatmeal with Orange Cookies, as well as organic chocolate is used in our Chocolate Chunk Cookie Mix, Luscious Chocolate Cake Mix, Chocolate Chip Walnut Cookies, and most importantly our top selling Irresistible Brownie Mix and Chunky Chocolate Chunk Cookies. Due to the unique flavor of organic chocolate (made with lecithin (unbleached)) it is essential in our formulations that make up over 38% of our Pamela's line. The potential harm to my company should I have to reformulate, reprint packaging and sales pieces, as well as the possible negative effect on the quality of our products and to our standing with customers could literally cause our demise.

Thank you for your time,


Pamela Giusto-Sorrells
President